

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JOHN R. LYON III, derivatively on behalf of  
AMC ENTERTAINMENT HOLDINGS, INC.,

Plaintiff,

vs.

ADAM M. ARON, CRAIG R. RAMSEY, CHRIS  
A. COX, LINCOLN ZHANG, JACK Q. GAO,  
LLOYD L. HILL, GARY F. LOCKE, HOWARD  
W. KOCH, JR., KATHLEEN M. PAWLUS,  
ANTHONY J. SAICH, MAOJUN ZENG, PHILIP  
LADER, LEE E. WITTLINGER, and ADAM J.  
SUSSMAN,

Defendants,

and

AMC ENTERTAINMENT HOLDINGS, INC., a  
Delaware corporation,

Nominal Defendant.

Case No. 1:21-cv-07940-AJN

**NOTICE OF DEFENDANTS' MOTION TO DISMISS**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law and Declaration of Joshua S. Amsel in Support of Defendants' Motion to Dismiss, Nominal Defendant AMC Entertainment Holdings, Inc. and Defendants Adam M. Aron, Craig R. Ramsey, Chris A. Cox, Lincoln Zhang, Jack Q. Gao, Mao Jun Zeng, Anthony J. Saich, Lloyd L. Hill, Gary F. Locke, Howard W. Koch, Jr., Kathleen M. Pawlus, Philip Lader, Lee E. Wittlinger, and Adam J. Sussman will move this Court in the above-captioned action, before the Honorable Alison J. Nathan, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and at a time to be set by the Court, for an Order dismissing the

Verified Stockholder Derivative Complaint, in its entirety and with prejudice, for *forum non conveniens* and under Federal Rules of Civil Procedure 12(b)(6) and 23.1, and for such other relief that the Court may deem just and proper.

Dated: New York, New York  
January 14, 2022

Respectfully submitted,

/s/ John A. Neuwirth

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